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August 2, 2023

**By ECF**

The Honorable Kenneth M. Karas  
The Hon. Charles L. Brieant Jr.  
Federal Building and United States Courthouse  
300 Quarropas Street, Chambers 533  
White Plains, NY 10601-4150

Re: *GlobalFoundries U.S. Inc. v.*  
*International Business Machines Corporation*  
Case No. 7:23-cv-03348-KMK-AEK

Dear Judge Karas:

We write on behalf of Defendant International Business Machines Corporation ("IBM") to request permission under Rule I.C of the Individual Rules of Practice of the Honorable Kenneth M. Karas to request an extension of time to file a motion to dismiss the Complaint filed by Plaintiff GlobalFoundries U.S. Inc. ("GF") on April 21, 2023 (ECF No. 1) in the above-captioned action pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6).

On July 20, 2023, the Court ordered that Defendant's motion is due August 19, 2023, Plaintiff's response is due September 19, 2023, and Defendant's reply is due October 9, 2023. In order to avoid weekend or holiday deadlines, we request a briefing schedule as follows:

Motion due: August 21, 2023  
Response due: September 22, 2023  
Reply due: October 11, 2023

Plaintiff GF has consented to this request. There have been no prior requests to extend the time for the motion to dismiss briefing schedule.

Respectfully submitted,

*/s/ Robert A. Atkins*

Robert A. Atkins

cc: All counsel of record (via ECF)